

**Federal Defenders  
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December 7, 2023

**Via ECF**

The Honorable Laura Taylor Swain  
Chief United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. John Burbano  
23 Cr. 502 (LTS)**

**MEMO ENDORSED**

Dear Chief Judge Swain,

I write to respectfully request a temporary modification of Mr. Burbano's bond in the above-captioned matter. Mr. Burbano's current bail conditions permit him to travel to and from the Eastern District of Pennsylvania for court appearances, legal meetings, and other travel pre-approved by Pretrial Services relating to a pending state court matter in Pennsylvania. Mr. Burbano (who does not have a car) has a state court appearance on the morning of December 12, 2023 and would like permission to travel to Pennsylvania and stay overnight the evening of December 11, 2023 so that he can ensure his timely appearance in state court. The government and Pretrial Services both consent to this request. Mr. Burbano will provide his itinerary to Pretrial Services if this travel is approved.

Accordingly, we respectfully request that the Court temporarily modify the conditions of Mr. Burbano's pretrial release to permit him to travel to and stay overnight in the Eastern District of Pennsylvania from December 11 to 12, 2023 for purposes of attending his state court appearance.

The foregoing request is granted. In light of Mr. Burbano's upcoming state court hearing, his travel restrictions are hereby amended to allow him to travel to and stay the night in Pennsylvania on the evening of December 11, 2023. This resolves docket entry no. 20. SO ORDERED.

/s/ Laura Taylor Swain, Chief. U.S.D.J.  
Dated: 12/7/2023

Respectfully submitted,

/s/

Neil P. Kelly  
Assistant Federal Defender  
(212) 417-8744

cc: AUSA William Kinder  
Pretrial Services Officer Jonathan Lettieri